

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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LEOR KWELLER and
ZOE LIBERMAN,

Plaintiffs,

-against-

NOTICE OF MOTION

Case No. 3:25-cv-00343-AJB-ML

BROOME COUNTY, *et al.*,

Defendants.

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PLEASE TAKE NOTICE that upon the enclosed Memorandum of Law, the undersigned, on behalf of defendant Alyssa Congdon (hereinafter “defendant”), shall move this Court upon submission of the papers before the Honorable Anthony J. Brindisi, U.S.D.J., for (a) an Order pursuant to Federal Rule of Civil Procedure § 12(b)(6) dismissing plaintiffs Leor Kweller and Zoe Liberman’s complaint in its entirety; and (b) for such other and further relief in favor of defendant as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 7.1(a)(1) of the Local Rules of Practice of the United States District Court for the Northern District of New York, any papers to be submitted in opposition to the within motion must be filed with the Clerk of the Court and served upon counsel for defendant no more than twenty-one (21) days after service of the motion, exclusive of that day.

DATED: May 19, 2025

Respectfully Submitted,

HACKER MURPHY, LLP

/s/James C. Knox

James C. Knox, Esq.

Bar Roll No. 51709

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Attorneys for defendant Alyssa Congdon